



Policies and Procedures
POLICY: ILHIE Authority Workforce, Agents, Contractors and Subcontractors
Policy #13
Effective Date: April 2, 2014

Purpose: This policy sets forth the responsibilities and terms under which the ILHIE Authority and its Workforce, contractors, Subcontractors, and agents may request, use or disclose Protected Health Information created, received, maintained, or transmitted using the ILHIE.

Policy:

- 1.0 Authorized Purposes.** The ILHIE Authority may authorize its Workforce, contractors, Subcontractors, and agents to request, use, or disclose Protected Health Information set forth in the Request, Use, and Disclosure of Protected Health Information Policy (Policy #5), the Data Sharing Agreement, and other applicable contracts, in accordance with the Minimum Necessary Policy (Policy #12) and only as permitted by Applicable Law.
- 2.0 Authorized Users.** The ILHIE Authority shall implement policies and procedures reasonably designed to enable members of its Workforce, contractors, Subcontractors and agents to disclose, in accordance with the role and job responsibility of the individual, only such Protected Health Information as is reasonably required to accomplish the performance of the purpose for which the Protected Health Information is being accessed or used.
- 3.0 Training.** ILHIE Authority Workforce members, contractors, Subcontractors, and agents may not access Protected Health Information through the ILHIE unless such individual has received training regarding these Policies and Procedures and the Workforce member's, contractors', Subcontractors', and agent's obligations under Applicable Law, and has acknowledged in writing the receipt of such training.
- 4.0 Compliance.** The ILHIE Authority shall discipline Workforce members, contractors, Subcontractors, and agents who are not in compliance with these Policies and Procedures or engage in any other unauthorized or inappropriate behavior that undermines the privacy or security of Protected Health Information created, received, maintained or transmitted through the ILHIE. Depending on the circumstances, disciplinary measures may include verbal and written warnings, retraining, demotion, suspension or termination of employment.
 - 4.1** The ILHIE Authority shall require all of its Workforce members, contractors, Subcontractors, and agents to report any actual or suspected non-compliance with these Policies and Procedures, the Data Sharing Agreement or Applicable Law of which they become aware. No Workforce member, contractor, Subcontractor, or agent may be subject to retaliation of any kind for reporting an actual or suspected non-compliance in good faith.
 - 4.2** Participants shall comply with these Policies and Procedures.

- 4.3** The ILHIE Authority shall monitor and enforce compliance with and adherence to these Policies and Procedures.
- 4.4** Participant shall cooperate with the ILHIE Authority in its monitoring and enforcement of the Participant's compliance with these Policies and Procedures.

Associated Policies & Procedures

45 C.F.R §160.103

45 C.F.R §160.514(a)-(c)

Data Sharing Agreement

Enforcement

ILHIE Personnel Handbook

Sanctions

Definitions

Authorized User

Subcontractor

Workforce